

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Suzanne Genereux, et al.,)	
)	
Plaintiff,)	Case No.: 04-cv-12137 JLT
v.)	
)	PORTIONS FILED UNDER SEAL
America Beryllia Corp, et al.,)	
)	CONTAINS CONFIDENTIAL
Defendants.)	INFORMATION, SUBJECT TO
)	TO PROTECTIVE ORDER

DEFENDANT BRUSH WELLMAN INC.'S DISCLOSURE OF EXPERT WITNESSES

Pursuant to Federal Rules of Civil Procedure 26(a)(2), Defendant, Brush Wellman Inc. discloses its expert witnesses.

A. The following experts are expected to testify at trial and detailed reports disclosing their opinions are attached hereto:

1. Gerald M. Goldhaber, Ph.D.
President
Goldhaber Research Associates, LLC
1525 Amherst Manor Drive, #907
Williamsville, New York 14221
(Report and CV attached as Exs. A and B)
2. Lawrence H. Repsher, M.D.
3555 Lutheran Parkway
Suite 330
Wheat Ridge, Colorado 80033
(Report, CV, and Rule 26 Disclosure attached as Exs. C, D and E)

Dr. Repsher's July 10, 2006 report regarding the IME, which has previously been produced, is also attached at Ex. F.

3. Richard P. Garrison, Ph.D., CIH, CSP
Garrison Industrial Health, LLC
1645 Northbrook Drive
Ann Arbor, MI 48103
(Report and CV attached as Ex. G and H)

4. Jonathan Benjamin Borak, M.D.
234 Church Street
New Haven, Connecticut 06510
(Report and CV attached as Ex. I and J)

B. Marc Kolan, CIH

Mr. Kolan is the Vice President of Environmental Health and Safety at Brush Wellman and may be asked to give testimony pursuant to Fed. R. Evid. 702, 703 and 705. He is not "retained or specially employed to provide expert testimony in the case," his duties do not "regularly involve giving expert testimony," and therefore no report is required under Rule 26(a)(2). Mr. Kolan, however, has substantial experience, technical knowledge and other information that will assist the trier of fact regarding Brush Wellman's warning label program, material safety data sheets, technical bulletins, other information provided to customers, and knowledge and understanding of the hazards of beryllium. Mr. Kolan also has substantial experience and familiarity with beryllium's uses, its regulatory history, and the 2 ug/m³ exposure standard, as set forth in greater detail in the enclosed article, "Introduction to Beryllium: Uses, Regulation, History and Disease." (Attached as Ex. K)

C. All experts identified by Plaintiffs and Co-Defendants in this litigation.

Brush Wellman expressly reserves the right to supplement these expert disclosures.

Dated: November 1, 2006

Respectfully submitted,

/s/ Robert S. Faxon
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Attorneys for Defendant Brush Wellman Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of November, 2006, a true and correct copy of the foregoing DEFENDANT BRUSH WELLMAN INC.'S DISCLOSURE OF EXPERT WITNESSES was served via U.S. mail, first class postage prepaid, upon the following:

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/s/ Robert S. Faxon
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